

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
AMERICAN METROCOMM)	Case No. 00-3358 (PJW)
CORPORATION, <i>et al.</i> ,)	
)	
Debtors.)	
)	
THOMAS ABRAMS,)	
)	
Appellant,)	
)	
v.)	Civil Action No. 04-1372 (JJF)
)	
AMC LIQUIDATING TRUST,)	Refers to Docket Number 31
)	
Appellee.)	

**OBJECTION OF THE TRUST ADMINISTRATOR TO THE MOTION OF
THOMAS ABRAMS FOR EXTENSION OF TIME FOR FILING NOTICE OF APPEAL**

COMES NOW, Charles W. Stewart, the Trust Administrator for the AMC Liquidating Trust, by and through his counsel and objects to the Motion of Thomas Abrams for Extension of Time for Filing Notice of Appeal (Docket No. 31) as set forth below.

1. Mr. Abrams, the Appellant, has failed to state good cause for the extension of time to file notice of appeal.
2. Mr. Abrams, a *pro se* litigant, has engaged in a pattern of extensive, arbitrary, vexatious and obdurate litigation during the course of this case and, once again, seeks to prolong the litigation in hopes of inducing the Trust Administrator to settle a meritless case.
3. The time and effort Mr. Abrams has expended in filing this motion to preserve his right to file an appeal is disproportionately large compared to the amount of effort it

would have taken him to properly file a one-page notice of appeal as is required by the Federal Rules of Appellate Procedure.

4. The filing of a notice of appeal does not require any extensive documentation or the use of a computer. A notice of appeal can be neatly handwritten and filed. It need not contain any factual pleadings other than the notice that the appeal is being filed.

5. Failure to file a notice of appeal in a timely fashion deprives the Court of Appeals for the Third Circuit of jurisdiction in this matter.

6. The time for filing a notice of appeal expired no later than Midnight on Monday, November 14, 2005.

7. Rule 4(a)(5)(ii) of the Federal Rules of Appellate Procedure states that the Court may grant an extension of time to file a notice of appeal if the party shows excusable neglect or good cause.

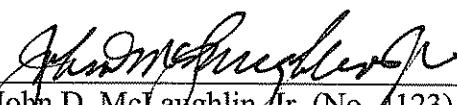
8. The Trust Administrator respectfully suggests that the effort displayed by Mr. Abrams in filing this motion to extend time shows that he was not neglectful of, or failed to understand, the deadline.

9. The Trust Administrator respectfully suggests that the simplicity of filing a notice of appeal and Abrams' failure to do so while filing a more complicated and unnecessary pleading indicates that Abrams has not good cause for the delay but merely insists on "playing lawyer" to the detriment of the AMC Liquidating Trust and the Federal Judiciary.

WHEREFORE, the Trust Administrator respectfully prays this Honorable Court to deny the Motion of Thomas Abrams for Extension of Time for Filing Notice of Appeal and for such other relief at law and in equity as this Court may deem to be proper.

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Dated: 17 Nov 05


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